

# EXHIBIT 4

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Page 1

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

\_\_\_\_\_  
UNITED STATES, ) 1:23-cv-00108-LMB-JFA  
et al., )  
)  
Plaintiffs, )  
)  
vs. )  
)  
GOOGLE LLC, )  
)  
Defendants. )  
\_\_\_\_\_)

VIDEOTAPED DEPOSITION OF

KENDALL OLIPHANT

August 9, 2023

9:32 a.m.

Reported by: Bonnie L. Russo  
Job No. 6031956

Veritext Legal Solutions

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|---|---|
| <p style="text-align: right;">Page 2</p> <p>1 Videotaped Deposition of Kendall Oliphant<br/>2 held at:<br/>3<br/>4<br/>5<br/>6 Paul, Weiss, Rifkind, Wharton &amp; Garrison, LLP<br/>7 2001 K Street, N.W.<br/>8 Washington, D.C.<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18 Pursuant to Notice, when were present on behalf<br/>19 of the respective parties:<br/>20<br/>21<br/>22</p>   | <p style="text-align: right;">Page 4</p> <p>1 APPEARANCES (CONTINUED):<br/>2<br/>3<br/>4 Also Present:<br/>5 Glen Fortner, Videographer<br/>6 Michael A. Cannon, Chief Counsel for Economic<br/>7 Affairs, United States Department of Commerce<br/>8<br/>9 Also Present Via Remotely:<br/>10 Julia Wood, DOJ<br/>11 Jeannie S. Rhea, Paul, Weiss, Rifkind, Wharton<br/>12 &amp; Garrison, LLP<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22</p>  |
| <p style="text-align: right;">Page 3</p> <p>1 APPEARANCES:<br/>2<br/>3 On behalf of the Plaintiffs:<br/>4 RACHEL ZWOLINSKI, ESQUIRE<br/>5 VICTOR LIU, ESQUIRE<br/>6 ALVIN CHU, ESQUIRE<br/>7 UNITED STATES DEPARTMENT OF JUSTICE<br/>8 1331 Pennsylvania Avenue, N.W.<br/>9 Washington, D.C. 20005<br/>10 rachel.zwolinski@usdoj.gov<br/>11<br/>12 On behalf of the Defendant:<br/>13 MARTHA L. GOODMAN, ESQUIRE<br/>14 ANNELEISE CORRIVEAU, ESQUIRE<br/>15 PAUL, WEISS, RIFKIND, WHARTON &amp;<br/>16 GARRISON, LLP<br/>17 2001 K Street, N.W.<br/>18 Washington, D.C. 20006<br/>19 mgoodman@paulweiss.com<br/>20 acorriveau@paulweiss.com<br/>21<br/>22</p> | <p style="text-align: right;">Page 5</p> <p>1 I N D E X<br/>2 EXAMINATION OF KENDALL OLIPHANT PAGE<br/>3 BY MS. GOODMAN 12<br/>4<br/>5<br/>6<br/>7<br/>8<br/>9<br/>10<br/>11<br/>12<br/>13<br/>14<br/>15<br/>16<br/>17<br/>18<br/>19<br/>20<br/>21<br/>22</p> <p style="text-align: center;">EXHIBITS</p> <p>8<br/>9 Exhibit 13 E-Mail Chain dated 1-17-23 48<br/>10 CENSUS-ADS-0000244816-818<br/>11<br/>12 Exhibit 14 Integrated Communications 79<br/>13 Contract<br/>14 Version 2<br/>15 10-5-18<br/>16 CENSUS-ADS-0000387420-490<br/>17<br/>18 Exhibit 15 E-Mail dated 9-14-22 90<br/>19 Attachment<br/>20 CENSUS-ADS-0000248031-186<br/>21<br/>22</p> |

## HIGHLY CONFIDENTIAL

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|--|---|
| <p style="text-align: right;">Page 10</p> <p>1 PROCEEDINGS</p> <p>2 (9:32 a.m.)</p> <p>3</p> <p>4 THE VIDEOGRAPHER: Good morning.</p> <p>5 We are going on the record at 9:32</p> <p>6 on August 9, 2024 -- 2023.</p> <p>7 Please note that the microphones are</p> <p>8 sensitive and may pick up whispering and</p> <p>9 private conversations. Please mute your phones</p> <p>10 at this time. Audio and video recording will</p> <p>11 continue to take place unless all parties agree</p> <p>12 to go off the record.</p> <p>13 This is Media Unit 1 of the</p> <p>14 video-recorded deposition of Kendall Oliphant</p> <p>15 in the matter of United States, et al. v.</p> <p>16 Google LLC. The location of the deposition is</p> <p>17 Paul Weiss.</p> <p>18 My name is Glen Fortner representing</p> <p>19 Veritext, and I am the videographer. The court</p> <p>20 reporter is Bonnie Russo from the firm</p> <p>21 Veritext.</p> <p>22 I am not related to any party in</p>   | <p style="text-align: right;">Page 12</p> <p>1 Paul Weiss.</p> <p>2 MS. WOOD: And Julia Wood from DOJ.</p> <p>3 I will be in and out throughout the day.</p> <p>4 THE VIDEOGRAPHER: Will the court</p> <p>5 reporter please swear in the witness, and then</p> <p>6 counsel may proceed.</p> <p>7</p> <p>8 KENDALL OLIPHANT,</p> <p>9 being first duly sworn, to tell the truth, the</p> <p>10 whole truth and nothing but the truth,</p> <p>11 testified as follows:</p> <p>12 EXAMINATION BY COUNSEL FOR DEFENDANT</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q. Good morning, Ms. Oliphant.</p> <p>15 A. Good morning.</p> <p>16 Q. Was your last name previously</p> <p>17 Johnson?</p> <p>18 A. Yes, it was.</p> <p>19 Q. Okay. So if we look at documents</p> <p>20 here today that refer to Kendall Johnson, that</p> <p>21 is yourself, correct?</p> <p>22 A. That is myself, yes.</p>   |
| <p style="text-align: right;">Page 11</p> <p>1 this action, nor am I financially interested in</p> <p>2 the outcome. If there are any objections to</p> <p>3 proceeding, please state them at the time of</p> <p>4 your appearance.</p> <p>5 Counsel and all present, including</p> <p>6 remotely, will now state their appearances and</p> <p>7 affiliations for the record beginning with the</p> <p>8 noticing attorney.</p> <p>9 MS. GOODMAN: Martha Goodman of Paul</p> <p>10 Weiss on behalf of the defendant, Google LLC,</p> <p>11 and I am joined colleague Annelise Corriveau.</p> <p>12 MS. ZWOLINSKI: Rachel Zwolinski on</p> <p>13 behalf of the United States.</p> <p>14 MR. LIU: Victor Liu on behalf of</p> <p>15 the United States.</p> <p>16 MR. CHU: Alvin Chu on behalf of the</p> <p>17 United States.</p> <p>18 MR. CANNON: Michael Cannon on</p> <p>19 behalf of the United States.</p> <p>20 MS. GOODMAN: And do we have any</p> <p>21 remote attendees?</p> <p>22 MS. RHEE: This is Jeannie Rhee from</p> | <p style="text-align: right;">Page 13</p> <p>1 Q. Have you been deposed before?</p> <p>2 A. Once.</p> <p>3 Q. And was that in connection with your</p> <p>4 work at the census bureau?</p> <p>5 A. No, it was not.</p> <p>6 Q. Okay. When was that deposition?</p> <p>7 A. Thinking. Maybe 2002, 2001, 2002.</p> <p>8 Q. So it's been 20-some odd years?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Just some basic rules of the</p> <p>11 road.</p> <p>12 Your counsel may object. Unless</p> <p>13 they instruct you not to answer the question,</p> <p>14 you should permit your counsel to object and</p> <p>15 then proceed to answer the question. Okay?</p> <p>16 A. Okay.</p> <p>17 Q. And to help Bonnie, our court</p> <p>18 reporter, please wait for me to finish my</p> <p>19 question, wait for your counsel to object, if</p> <p>20 any, and then proceed with your answer so that</p> <p>21 we're not talking over each other. Sound good?</p> <p>22 A. Sounds good.</p> |

## HIGHLY CONFIDENTIAL

| Page 58   | Page 60   |
|---|---|
| <p>1 Q. Is that because you only have an</p> <p>2 understanding based on privileged</p> <p>3 communications?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And with whom are those --</p> <p>6 did those privileged communications take place?</p> <p>7 A. Commerce lawyer, Mike Cannon.</p> <p>8 Q. Any lawyers from the Department of</p> <p>9 Justice?</p> <p>10 A. No.</p> <p>11 Q. Okay. Do you know what date this</p> <p>12 lawsuit was filed?</p> <p>13 A. Honestly, no.</p> <p>14 Q. It was filed on January 24, 2023.</p> <p>15 A. Okay.</p> <p>16 Q. I will state that for the record.</p> <p>17 So with that sort of time period in</p> <p>18 mind, do you recall any conversations prior to</p> <p>19 January 24, 2023, with any lawyers for the</p> <p>20 Department of Justice with respect to using</p> <p>21 Google in the census's digital advertising paid</p> <p>22 media for the 2020 census?</p>           | <p>1 -- strike that.</p> <p>2 What is your best recollection of</p> <p>3 when, if at all, you spoke with lawyers from</p> <p>4 the Department of Justice about the census</p> <p>5 bureau's use of Google in the 2020 census?</p> <p>6 MS. ZWOLINSKI: Objection. Form.</p> <p>7 THE WITNESS: It would have had to</p> <p>8 have been somewhere in the time frame of when</p> <p>9 the -- when the suit was filed.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q. Do you recall any conversations</p> <p>12 prior to January of 2023?</p> <p>13 MS. ZWOLINSKI: Objection. Form.</p> <p>14 THE WITNESS: I don't recall.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q. I will represent to you that the</p> <p>17 United States Department of Justice has been</p> <p>18 investigating Google's advertising practices</p> <p>19 for the last three years. So over that --</p> <p>20 meaning the '21 -- 2021, 2022, 2023.</p> <p>21 In the years 2021 or 2022, do you</p> <p>22 recall any conversation with any lawyer from</p> |
| Page 59   | Page 61   |
| <p>1 MS. ZWOLINSKI: Objection. Form.</p> <p>2 THE WITNESS: I don't recall.</p> <p>3 BY MS. GOODMAN:</p> <p>4 Q. Is it typical in your day-to-day</p> <p>5 work to speak with lawyers from the Department</p> <p>6 of Justice?</p> <p>7 MS. ZWOLINSKI: Objection. Form.</p> <p>8 THE WITNESS: I do not speak to</p> <p>9 anybody from Justice that -- I don't -- no, it</p> <p>10 is not.</p> <p>11 BY MS. GOODMAN:</p> <p>12 Q. And so if you did speak with lawyers</p> <p>13 from the Department of Justice, is that</p> <p>14 something you might remember because it is not</p> <p>15 usual in the course of your work?</p> <p>16 MS. ZWOLINSKI: Objection. Form.</p> <p>17 THE WITNESS: I may remember</p> <p>18 speaking to them. I may not necessarily</p> <p>19 remember timing.</p> <p>20 BY MS. GOODMAN:</p> <p>21 Q. Okay. And do you have any</p> <p>22 recollection of a timing -- the timing during</p> | <p>1 the Department of Justice about census bureau's</p> <p>2 use of Google for the 2020 census?</p> <p>3 A. No.</p> <p>4 MS. ZWOLINSKI: Objection. Form.</p> <p>5 BY MS. GOODMAN:</p> <p>6 Q. So as of January 17, 2023, that we</p> <p>7 -- that you sent this e-mail to Mr. Benson, at</p> <p>8 this time, did you anticipate participating in</p> <p>9 litigation on behalf of the United States</p> <p>10 against Google?</p> <p>11 MS. ZWOLINSKI: Objection. Form.</p> <p>12 THE WITNESS: I did not.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q. At this time in January of 2023, did</p> <p>15 you have any knowledge or awareness of any</p> <p>16 investigation by the Department of Justice of</p> <p>17 -- of Google with respect to its advertising</p> <p>18 businesses?</p> <p>19 MS. ZWOLINSKI: Objection. Form.</p> <p>20 THE WITNESS: Can you be more</p> <p>21 specific?</p> <p>22 BY MS. GOODMAN:</p>   |

16 (Pages 58 - 61)

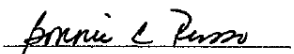
## HIGHLY CONFIDENTIAL

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| <p style="text-align: right;">Page 62</p> <p>1 Q. Have you ever -- strike that.</p> <p>2 To what extent, if any, were you</p> <p>3 aware in January of 2023, that the Department</p> <p>4 of Justice Antitrust Division was investigating</p> <p>5 Google?</p> <p>6 MS. ZWOLINSKI: Objection. Form.</p> <p>7 THE WITNESS: I guess when they</p> <p>8 actually filed the suit.</p> <p>9 BY MS. GOODMAN:</p> <p>10 Q. And so prior to January 24, 2023,</p> <p>11 when the Department of Justice filed the</p> <p>12 lawsuit, you were not aware of any</p> <p>13 investigation that the antitrust division was</p> <p>14 doing of Google, correct?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: I honestly -- I don't</p> <p>17 recall.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. You don't recall any awareness of an</p> <p>20 investigation; is that right?</p> <p>21 MS. ZWOLINSKI: Objection. Form.</p> <p>22 THE WITNESS: I didn't recall when</p> | <p style="text-align: right;">Page 64</p> <p>1 THE WITNESS: No.</p> <p>2 BY MS. GOODMAN:</p> <p>3 Q. So for the record, your testimony is</p> <p>4 that you never sought the legal advice of the</p> <p>5 antitrust division with respect to</p> <p>6 anticompetitive on the part of --</p> <p>7 anticompetitive conduct on the part of Google;</p> <p>8 is that correct?</p> <p>9 A. That is correct.</p> <p>10 Q. Have you received a litigation hold</p> <p>11 in this case?</p> <p>12 A. Yes.</p> <p>13 Q. And approximately when did you</p> <p>14 receive that hold?</p> <p>15 A. For context. We have a lot going</p> <p>16 on. I can't honestly tell you when I first</p> <p>17 started hearing about it or when I first</p> <p>18 started -- when I got the litigation hold.</p> <p>19 If I go through my e-mail, I can</p> <p>20 tell you, but off the top of my head, we have</p> <p>21 way too many deadlines that we are trying to</p> <p>22 meet for this to be -- until it became a big</p> |
| <p style="text-align: right;">Page 63</p> <p>1 the lawsuit was filed, so the timing, I can't</p> <p>2 -- no. I don't recall. I don't -- I'm not</p> <p>3 aware.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. Prior to -- strike that.</p> <p>6 In the course of your work as the</p> <p>7 COR for Order 15, did you ever form a view that</p> <p>8 Google's -- Google was engaging in</p> <p>9 anticompetitive conduct?</p> <p>10 MS. ZWOLINSKI: Objection. Form.</p> <p>11 THE WITNESS: No, I did not.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q. And did you ever seek the legal</p> <p>14 advice of the antitrust division with respect</p> <p>15 to any anticompetitive conduct on the part of</p> <p>16 Google?</p> <p>17 MS. ZWOLINSKI: Objection. Form and</p> <p>18 privileged.</p> <p>19 MS. GOODMAN: It's a yes or no</p> <p>20 question. It's not privileged. I am asking</p> <p>21 whether she sought legal advice.</p> <p>22 MS. ZWOLINSKI: Objection. Form.</p>        | <p style="text-align: right;">Page 65</p> <p>1 thing, a real thing, for it -- it just -- it</p> <p>2 just seemed like it was information seeking, so</p> <p>3 I don't know.</p> <p>4 MS. ZWOLINSKI: Counsel, we've been</p> <p>5 going over -- we've been going for over an</p> <p>6 hour. Can we take a break.</p> <p>7 MS. GOODMAN: Yeah, once I finish</p> <p>8 this line of questioning, I am happy to break.</p> <p>9 MS. ZWOLINSKI: How much time do you</p> <p>10 anticipate that line of questioning taking?</p> <p>11 MS. GOODMAN: A few more minutes.</p> <p>12 MS. ZWOLINSKI: Okay.</p> <p>13 BY MS. GOODMAN:</p> <p>14 Q. You -- in your prior answer, you</p> <p>15 said that it seemed like it was just</p> <p>16 information seeking.</p> <p>17 What did you mean by that?</p> <p>18 MS. ZWOLINSKI: Objection. Form.</p> <p>19 THE WITNESS: We get asked questions</p> <p>20 all the time. It was just responding to a</p> <p>21 request.</p> <p>22 BY MS. GOODMAN:</p>                     |

## HIGHLY CONFIDENTIAL

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| <p style="text-align: right;">Page 298</p> <p>1 document, do you have an understanding now of</p> <p>2 what DV360 is?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 THE WITNESS: My understanding would</p> <p>5 be it's used to serve ads.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q. Okay.</p> <p>8 A. Google uses it to serve ads.</p> <p>9 Q. Okay. And so do you see in this</p> <p>10 document then that the reach for the census --</p> <p>11 strike that.</p> <p>12 What is your reaction to the news</p> <p>13 that Google is saying you have reached 214</p> <p>14 million unique users as of March 3, 2020?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: That's a good thing.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. I'm sorry?</p> <p>19 A. That's a good thing.</p> <p>20 Q. And did Google help the census</p> <p>21 bureau obtain its advertising goals?</p> <p>22 MS. ZWOLINSKI: Objection. Form.</p>                                   | <p style="text-align: right;">Page 300</p> <p>1 Q. Okay. But just in terms of the</p> <p>2 course of your experience working on Order 15,</p> <p>3 does any one particular advertising mechanism</p> <p>4 stand out to you as one that was particularly</p> <p>5 effective in helping the census bureau obtain</p> <p>6 its goals?</p> <p>7 MS. ZWOLINSKI: Objection. Form.</p> <p>8 THE WITNESS: They really all -- if</p> <p>9 they didn't work together, because they all</p> <p>10 bring something different to the table to reach</p> <p>11 audiences in a different way, and each audience</p> <p>12 receives or utilizes different media. It is --</p> <p>13 it is hard to point to one particular vendor</p> <p>14 and say, you know, they are responsible or they</p> <p>15 had the greatest impact because while it may</p> <p>16 have an impact here, it may not have, overall,</p> <p>17 it may not have had as high of an impact.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. If you needed to figure out how much</p> <p>20 money was paid to Google through funds</p> <p>21 allocated under the Order 15 contract, how</p> <p>22 would you go about doing that?</p> |
| <p style="text-align: right;">Page 299</p> <p>1 THE WITNESS: The combination of</p> <p>2 Google and all of our advertisers helped us</p> <p>3 obtain our goals.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. Okay. And was there any one digital</p> <p>6 tool in your toolkit from your point of view</p> <p>7 that particularly aided in the meeting of the</p> <p>8 goals?</p> <p>9 MS. ZWOLINSKI: Objection. Form.</p> <p>10 THE WITNESS: They all had a part in</p> <p>11 helping us reach our goals.</p> <p>12 BY MS. GOODMAN:</p> <p>13 Q. Did any one of them have a greater</p> <p>14 role than others?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: Well, at this point in</p> <p>17 time, it is clearly Google, but this is just a</p> <p>18 snapshot in time so -- and this is before</p> <p>19 pandemic, so no, I have no -- I can't speak to</p> <p>20 any time later without a similar type of</p> <p>21 report.</p> <p>22 BY MS. GOODMAN:</p> | <p style="text-align: right;">Page 301</p> <p>1 MS. ZWOLINSKI: Objection. Form.</p> <p>2 THE WITNESS: I would contact the</p> <p>3 buying agency. I would call Reingold.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. Have you had to call Reingold in the</p> <p>6 course of this litigation to figure out how</p> <p>7 much money has been paid to Google?</p> <p>8 MS. ZWOLINSKI: Objection.</p> <p>9 THE WITNESS: No.</p> <p>10 BY MS. GOODMAN:</p> <p>11 Q. And to your knowledge, is there a</p> <p>12 way to figure out how much money was paid to</p> <p>13 Google for programmatic advertising?</p> <p>14 MS. ZWOLINSKI: Objection. Form.</p> <p>15 THE WITNESS: I don't have those</p> <p>16 means. Census doesn't have that. We would go</p> <p>17 directly to Reingold.</p> <p>18 BY MS. GOODMAN:</p> <p>19 Q. So sitting here today, if you could</p> <p>20 only rely on the census bureau to figure out</p> <p>21 how much money was paid to Google through funds</p> <p>22 allocated in Order 15, how would you do that?</p>   |

## HIGHLY CONFIDENTIAL

| Page 334   | Page 336  |
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| <p>1 provided you legal advice?</p> <p>2 MS. ZWOLINSKI: Objection. Form.</p> <p>3 THE WITNESS: No.</p> <p>4 BY MS. GOODMAN:</p> <p>5 Q. Okay. And is your answer the same</p> <p>6 in January of 2023?</p> <p>7 MS. ZWOLINSKI: Objection. Form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MS. GOODMAN:</p> <p>10 Q. Okay. And in the course of your</p> <p>11 participation in this lawsuit if you've had</p> <p>12 questions about your participation in this</p> <p>13 lawsuit, have you turned to the attorneys at</p> <p>14 the antitrust division with your questions?</p> <p>15 MS. ZWOLINSKI: Objection. Form.</p> <p>16 THE WITNESS: No.</p> <p>17 BY MS. GOODMAN:</p> <p>18 Q. To whom have you turned, if anyone?</p> <p>19 A. Commerce.</p> <p>20 Q. And is that Mr. Cannon?</p> <p>21 A. That's Mr. Cannon, yes.</p> <p>22 Q. Do you consider the lawyers for the</p> | <p>1 MS. GOODMAN: I have no further</p> <p>2 questions. I'll pass the witness.</p> <p>3 MS. ZWOLINSKI: We have no</p> <p>4 questions.</p> <p>5 MS. GOODMAN: Okay. Thank you so</p> <p>6 much for your time, Ms. Oliphant. I very much</p> <p>7 appreciate it.</p> <p>8 THE WITNESS: You're welcome. Thank</p> <p>9 you.</p> <p>10 THE VIDEOGRAPHER: Off the record.</p> <p>11 MS. GOODMAN: Yes.</p> <p>12 THE VIDEOGRAPHER: This marks the</p> <p>13 end of the deposition of Kendall Oliphant. We</p> <p>14 are going off the record at 18:24.</p> <p>15 (Whereupon, the proceeding was</p> <p>16 concluded at 6:24 p.m.)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>  |
| Page 335   | Page 337  |
| <p>1 antitrust division to be lawyers for the census</p> <p>2 bureau?</p> <p>3 MS. ZWOLINSKI: Objection. Form.</p> <p>4 Foundation.</p> <p>5 THE WITNESS: I do not.</p> <p>6 BY MS. GOODMAN:</p> <p>7 Q. Why not?</p> <p>8 MS. ZWOLINSKI: Objection. Form.</p> <p>9 Foundation.</p> <p>10 THE WITNESS: Since census has their</p> <p>11 own lawyers and we have commerce lawyers, and I</p> <p>12 believe the commerce lawyers would be more --</p> <p>13 more sort of categorized in that way versus</p> <p>14 DOJ.</p> <p>15 BY MS. GOODMAN:</p> <p>16 Q. Okay. And is your answer the same</p> <p>17 with respect to your participation in this</p> <p>18 lawsuit as a representative of the census</p> <p>19 bureau?</p> <p>20 MS. ZWOLINSKI: Objection. Form.</p> <p>21 Foundation.</p> <p>22 THE WITNESS: Yes.</p>   | <p>1 CERTIFICATE OF NOTARY PUBLIC</p> <p>2 I, Bonnie L. Russo, the officer before</p> <p>3 whom the foregoing deposition was taken, do</p> <p>4 hereby certify that the witness whose testimony</p> <p>5 appears in the foregoing deposition was duly</p> <p>6 sworn by me; that the testimony of said witness</p> <p>7 was taken by me in shorthand and thereafter</p> <p>8 reduced to computerized transcription under my</p> <p>9 direction; that said deposition is a true</p> <p>10 record of the testimony given by said witness;</p> <p>11 that I am neither counsel for, related to, nor</p> <p>12 employed by any of the parties to the action in</p> <p>13 which this deposition was taken; and further,</p> <p>14 that I am not a relative or employee of any</p> <p>15 attorney or counsel employed by the parties</p> <p>16 hereto, nor financially or otherwise interested</p> <p>17 in the outcome of the action.</p> <p>18</p> <p>19 </p> <p>20 Notary Public in and for</p> <p>21 the District of Columbia</p> <p>22 My Commission expires: August 14, 2025</p> |

85 (Pages 334 - 337)